



U.S. Department of Energy
Office of River Protection

P.O. Box 450
Richland, Washington 99352

01-OSR-0483

Mr. Ron F. Naventi, Project Manager
Bechtel National, Inc.
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC-01RV14136 - PARTIAL APPROVAL OF BECHTEL NATIONAL, INC. (BNI)
AUTHORIZATION BASIS CHANGE NOTICE, ABCN-24590-01-00004, REV. 1.

- References:
1. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval - Authorization Basis Change Notice ABCN-24590-01-00004, Revision 1, Identification Of Safety Analysis Report Format and Content," CCN 023770, dated November 2, 2001.
 2. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal of Authorization Basis Change Notice ABCN-24590-01-00004, Revision 0, Selection of DOE-STD-3009 as the Safety Analysis Report Implementing Standard," CCN 022459, dated September 18, 2001.

On the basis of the enclosed safety evaluation report, the U.S. Department of Energy, Office of River Protection, Office of Safety Regulation (OSR) partially approves the referenced Authorization Basis Change Notice (ABCN), ABCN-24590-01-00004, to the Safety Requirements Document (SRD) and the Integrated Safety Management Plan (ISMP) for the River Protection Project-Waste Treatment Plant (RPP-WTP). The partial approval is in response to your ABCN submittal dated November 2, 2001 (Reference 1). The OSR approved five of the eight changes requested by Bechtel National, Inc. Revision 0 of the ABCN (Reference 2), which was noticed on the OSR website on September 27, 2001, to solicit public comments. No public comments were received within the two-week comment period.

The five ABCN changes approved by OSR revise several related sections of the SRD and ISMP. The revisions include:

1. Replacement of reference sections of the ISMP as the implementing standard for the preparation of safety analysis reports (SARs) with reference to a new Appendix to SRD Volume II, "*Ad hoc Implementing Standard for Safety Analysis Reports*" in SRD Safety Criteria 9.1-1, 9.1-2, and 9.1-3.
2. Addition of SRD Appendix A, "*Implementing Standard for Safety Standards and Requirements Identification*" as an implementing standard for SRD Safety Criterion 9.1-1.

3. Addition of (a) initial surveillance and in-service testing, (b) maintenance, and (c) an Executive Summary as topics to be addressed in the SAR for SRD Safety Criterion 9.1-2.
4. Correction of editorial errors in SRD Safety Criteria 9.1-3 and 9.1-4.
5. Deletion of the chapter number and chapter title from the FSAR discussion of the Deactivation and Decommissioning chapter of ISMP Section 3.3.1.3.

The three changes not approved are discussed in detail in the enclosed safety evaluation report.

As part of the ABCN implementing process, please submit within 14 days of receipt of this letter the revised pages of the SRD and ISMP and the revision page for each document identifying all revisions to date. Revision of the ABCN and ABCN supporting information to address the discrepancies noted in the report should be included. This change is effective immediately and shall be fully implemented within 30 days, i.e., the provisions of the change may be used immediately; within 30 days, controlled copies of the SRD and ISMP and subordinate documents must be modified to reflect the associated change.

If you have any questions concerning this approval, please contact Lewis F. Miller, OSR (509) 376-6817. Nothing in this letter should be construed as changing the Contract, DE-AC27-01-RV14136. If, in my capacity as the Safety Regulation Official, I provide any direction that your company believes exceeds my authority or constitutes a change to the Contract, you will immediately notify the Contracting Officer and request clarification prior to complying with the direction.

Sincerely,

Robert C. Barr
Safety Regulation Official
Office of Safety Regulation

OSR:LFM

Enclosure

**Safety Evaluation Report (SER)
of Proposed Authorization Basis Change Notice
ABCN-24590-01-00004
to the Safety Requirements Document and the
Integrated Safety Management Plan
for the River Protection Project-Waste Treatment Plant
by the Office of Safety Regulation**

1.0 INTRODUCTION

The River Protection Project Waste Treatment Plant (RPP-WTP) authorization basis is the composite of information provided by a Contractor in response to radiological, nuclear, and process safety requirements that is the basis on which the Office of Safety Regulation (OSR) Safety Regulation Official grants permission to perform regulated activities. The authorization basis includes that information requested by the Contractor for inclusion in the authorization basis and subsequently accepted by the OSR. The authorization basis for the RPP-WTP includes the Safety Requirements Document (SRD) and the Integrated Safety Management Plan (ISMP). The SRD contains the approved set of radiological, nuclear and process safety standards and requirements, which if implemented, provide adequate protection of workers, the public, and the environment against the hazards associated with the operation of the facility. The ISMP defines a set of integrated activities that is directed toward the management or control of radiological, nuclear, and process hazards such that adequate protection is provided to workers, the public, and the environment.

On November 2, 2001, Bechtel National, Inc., (Contractor) submitted a proposed amendment to the SRD and ISMP.¹ This SER documents the OSR evaluation of the changes proposed by the Contractor in the area of safety analysis report format and content. The Contractor had submitted these changes earlier on September 18, 2001,² but withdrew the submittal with the November 2, 2001 letter. The amendment proposes the following changes to the SRD and ISMP:

1. Replacement of reference to sections of the ISMP as the implementing standard for the preparation of safety analysis reports (SARs) with reference to a new Appendix to SRD Volume II, "*Ad Hoc Implementing Standard for Safety Analysis Reports*" in SRD Safety Criteria 9.1-1, 9.1-2, and 9.1-3.
2. Addition of SRD Appendix A, "*Implementing Standard for Safety Standards and Requirements Identification*" as an implementing standard for SRD Safety Criterion 9.1-1.
3. Addition of (a) initial surveillance and in-service testing, (b) maintenance, and (c) an Executive Summary as topics to be addressed in the SAR for SRD Safety Criterion 9.1-2.

¹ BNI letter from A.R. Veirup to M.K. Barrett, ORP, "Contract No. DE-AC27-01RV14136 - Transmittal for Approval - Authorization Basis Change Notice ABCN-24590-01-00004, Revision 1, Identification of Safety Analysis Report Implementing Standard," CCN 023770, dated November 2, 2001.

² BNI letter from A.R. Veirup to M.K. Barrett, ORP, "Transmittal of Authorization Basis Change Notice ABCN-24590-01-00004, Revision 0, Selection of DOE-STD-3009 as the Safety Analysis Report Implementing Standard," CCN022459, dated September 18, 2001.

4. Correction of editorial errors in SRD Safety Criteria 9.1-3 and 9.1-4.
5. Deletion of the requirement that the hazard analysis be submitted as part of the SAR in SRD Safety Criterion 9.1-7.
6. Deletion of the chapter number and chapter title from the FSAR discussion of the Deactivation and Decommissioning chapter of ISMP Section 3.3.1.3.
7. Replacement of reference to NRC Regulatory Guide 3.52, "*Standard Format and Content for the Health and Safety Section of License Application for Fuel Cycle Facilities*" with reference to SRD Volume II, Section 9.1 for the format and content of the SARs, and replacement of reference to NUREG 1520, "*Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility*" with reference to review guidance prepared by DOE with specific reference to RL/REG-99-05, "*Review Guidance for the Construction Authorization Request (CAR)*." Also, deletion of Tables 4-1 and 4-2, the text that references the two tables, and the example of how Table 4-1 was developed.
8. Addition of reference for RL/REG-99-05, "*Review Guidance for the Construction Authorization Request*," and deletion of references to Regulatory Guide 3.52, "*Standard Format and Content for the Health and Safety Section of License Application for Fuel Cycle Facilities*" and to NUREG 1520, "*Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility*" from ISMP Chapter 13.

2.0 BACKGROUND

The ISMP and SRD describe the process for preparing Safety Analysis Reports for the WTP. The Safety Analysis Reports document the safety analysis for the facility to demonstrate that it can be safely operated, maintained, and shut down. The format and content of the Preliminary Safety Analysis Report (PSAR) and Final Safety Analysis Report (FSAR) were identified by BNI in Section 4.2.3.1, "Safety Analysis Reports," of the ISMP, and are in accordance with the guidance provided in U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide 3.52, *Standard Format and Content for the Health and Safety Sections of License Applications for Fuel Cycle Facilities*, draft (NRC 1995a). To facilitate the review of the SARs by the regulator, the SAR content also gives consideration to the review guidance provided in *Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility*, NUREG-1520, draft (NRC 1995b).

BNI has proposed that DOE-STD-3009, "*Preparation Guide for U.S. Department of Energy Nonreactor Nuclear Facility Safety Analysis Reports*," be used as the format for preparing Safety Analysis Reports. They would, however, continue to use the content information contained in NRC Regulatory Guide 3.52, "*Standard Format and Content for the Health and Safety Sections of License Applications for Fuel Cycle Facilities*," and in NUREG-1520, "*Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility*."

3.0 EVALUATION

The following sections summarize the OSR evaluation of the ABCN submittal.

3.1 Changes to the SRD

Proposed changes to SRD-SC 9.1-1, 9.1-2, and 9.1-3: Replace reference to sections of the ISMP as the implementing standard for preparation of safety analysis reports (SARs) with reference to a new SRD Volume II, Appendix *, "Ad hoc Implementing Standard for Safety Analysis Reports."

Evaluation (acceptable): The revision replacing references to Section 3.3.1.3, "Safety Analysis Reports," and Section 4.2.3, "Tailoring of Safety-Related Documentation," as implementing standards with the newly proposed ad hoc standard is acceptable because the information in these references has been transferred to the new SRD Volume II, Appendix *. The proposed change is not a reduction in scope.

Proposed change to SRD-SC 9.1-1: Add as an implementing standard SRD Appendix A, "Implementing Standard for Safety Standards and Requirements Identification."

Evaluation (acceptable): Addition of SRD Appendix A to this safety criterion as an additional implementing standard is acceptable because the implementing standard provides a tailored approach to developing and evaluating the adequacy of the authorization basis for the facility, which is a requirement for SRD SC 9.1-1. The proposed change is not a reduction in scope.

Proposed change to SRD-SC 9.1-2: Add initial surveillance and in-service testing, and maintenance as topics to be addressed in the SAR, and also add a requirement to provide an executive summary in the SAR.

Evaluation (acceptable): The proposed addition of subsections covering initial surveillance and in-service testing, and maintenance in the revised format of the SAR is acceptable since these topics are implicitly already in the required content of the SAR (e.g., Section 3.2 on maintenance) or are required to be addressed in the construction authorization request by DOE/RL-96-0003. Addition of a requirement to provide an executive summary in the SAR is also acceptable. The proposed change is not a reduction in scope.

Proposed Change to SRD-SC 9.1-3 and 9.1-4: Correct editorial errors.

Evaluation (acceptable): The correction of these editorial errors is acceptable. The proposed change is not a reduction in scope.

Proposed change to SRD-SC 9.1-7: Delete the requirement that the hazard analysis be submitted as part of the SAR. This will delete the entire safety criterion, as the other portion is deleted by ABCN 24590-01-00006.

Evaluation (not acceptable): The proposed change is not acceptable because submittal of a

revision to the hazards analysis report as part of the Construction Authorization Request is required by Standard 7, Section (e)(2)(v) of the BNI Contract. Deletion of the second part of Safety Criterion 9.1-7 was previously approved by ABCN 24590-01-00006, and remains acceptable.

3.2 Changes to the ISMP

Proposed Change to ISMP Sections 4.2.3.1: Replace reference to NRC Regulatory Guide 3.52, "*Standard Format and Content for the Health and Safety Section of License Application for Fuel Cycle Facilities*" with reference to SRD Volume II, Section 9.1 for the content and format of the SARs. Replace reference to NUREG-1520, *Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility* with reference to review guidance developed by DOE with specific reference to RL/REG-99-05 for the PSAR. Delete ISMP Tables 4-1 and 4-2, the text that references these two tables, and the example of how Table 4-1 was developed. ISMP Chapter 4 will have pagination changes to accommodate these additions and deletions. (ISMP Table 4-1 moves to the proposed ad hoc implementing standard.)

Evaluation (partially acceptable): The proposed revision to ISMP is partially acceptable as noted for each subsection in the following discussion.

The request to replace reference to Regulatory Guide 3.52 with reference to SRD Volume II, Section 9.1 for the format of the SAR is acceptable because the required elements of an SAR are covered in SRD Volume II, Section 9.1 such that this is not a reduction in commitment. However, the use of SRD Volume II, Section 9.1 for the content of the SAR is not acceptable since this is a substantive change. The content will remain the same as described in Regulatory Guide 3.52, as previously agreed to between BNI and the OSR and as discussed by BNI in the second paragraph under Section K, "Justification of the proposed change."

The request to replace reference to NUREG-1520 with reference to review guidance prepared by DOE with specific reference to RL/REG-99-05 for the PSAR is acceptable since this is not a reduction in commitment. However, BNI is cautioned that RL/REG-99-05 is guidance on how Regulatory Guide 3.52 and NUREG-1520 may acceptably applied to the WTP, but contains no new requirements beyond those already defined in the SRD or ISMP.

The request to delete ISMP Tables 4.1 and 4.2, the text that references these two tables, and the example on how Table 4-1 was developed, is acceptable provided: Table 4-1 is placed in the proposed ad hoc implementing standard, the table showing how chapters in Regulatory Guide 3.52 relate to the new location for the WTP SAR (included as Attachment 3 of the BNI ABCN) is included with Table 4.1, and Table 4-2 showing the planned differences between the PSAR and the FSAR content and the shift toward conduct of operations in the FSAR is also included in the proposed ad hoc standard. This proposed change is not a reduction in commitment

Proposed Change to ISMP Chapter 13: Add a reference for RL/REG-99-05 and delete references to Regulatory Guide 3.52 and NUREG-1520 (NRC 1995a and 1995b).

Evaluation (partially acceptable): Addition of RL/REG-99-05 to the list of references is acceptable since this is not a reduction in commitment. Reference to RL/REG-99-05 should be to Revision 3, which was issued in July 2001. Deletion of Regulatory Guide 3.52 and NUREG-1520 from the reference list is not acceptable, as these are still needed as references to Tables 4-1 and 4-2 in the proposed SRD ad hoc implementing standard.

3.3 Comments on Other Portions of the ABCN

In Section F, "List associated ABCNs and AB documents," of the ABCN, BNI stated that there were no associated ABCNs. However, in Section E, "Describe the proposed changes to the AB documents," Item 5, BNI references ABCN 24590-01-00006. This ABCN should be listed in Section F.

In Section G, "Explain why the change is needed," Item 6, of the ABCN, BNI states, "with the selection of a new standard, the chapter numbers do need to be identified in the ISMP." This should state that the chapter numbers do not need to be identified.

In Section K, "Justification of the proposed change," first paragraph, of the ABCN, BNI provided justification for dropping Regulatory Guide 3.52 as the implementing standard for the documentation of the safety analyses as a "draft guide" that was never issued. Since BNI will continue to use Regulatory Guide 3.52 in the proposed ad hoc implementing standard (at least for comparative purposes), this paragraph should be eliminated. The third paragraph could also be deleted as it adds little to the justification for the proposed change.

Attachment 1 to the ABCN, "Appendix *: Ad Hoc Implementing Standard for Safety Analysis Reports," Table *-1 lists the deviations from the SAR content guidance of Regulatory Guide 3.52. This table is the same as Table 4-1 of the ISMP with the exception that BNI has removed a callout to Section 3.3, "Quality Assurance." BNI should justify why Section 3.3, "Quality Assurance" was removed from Table *-1, or correct the Table *-1 to include Section 3.3, "Quality Assurance."

Attachment 1 to the ABCN also presented a new Table of Contents for the safety analysis reports. The outline as presented is very similar to that used in DOE-STD-3009-94, "Preparation Guide for U.S. Department of Energy Nonreactor Nuclear Facility Safety Analysis Reports." The OSR has the following comments on the proposed Table of Contents:

- 1) Section 3, Hazard and Accident Analyses - BNI added four additional subsections that are not contained in DOE-STD-3009-94: 3.5 - Hazard Classification; 3.6 - Common Cause and Common Mode Design Basis Events; 3.7 - Seismic Probabilistic Risk Assessment; and 3.8 - Adherence to Risk Goals and Results. This is acceptable as additional clarifying details required to be addressed by the BNI Contract.
- 2) Section 8, Hazardous Material Protection – DOE-STD-3009-94 includes subsection 8.4, "The ALARA Policy and Program," which was not included in the BNI outline. ALARA should be addressed for exposure to potential hazardous materials just as it is for

radiation exposure. BNI should justify why this section was left out of their outline, or add it back into their outline.

- 3) Section 14, Quality Assurance - BNI did not include any of the subsections on QA from DOE-STD-3009-94. BNI plans to simply reference the approved QA Manual. This is acceptable.
- 4) Section 16, Deactivation and Decommissioning - BNI added four subsections: 16.3 - Design and Operational Features; 16.4 - Deactivation Requirements; 16.5 - Transition Readiness; and 16.6 - Turning over WTP Facilities to DOE. All four of these requirements are related to the BNI Contract and provide BNI a place to discuss them. This is acceptable.
- 5) Section 18, Fire Safety Program - BNI has added this chapter to their PSAR outline. DOE-STD-3009-94 includes a discussion of Fire Safety within Section 11, Operational Safety. The subsections identified by BNI are the same as in Section 11 of DOE-STD-3009-94. This is acceptable.

Attachment 2 on changes to the ISMP, Section 13.0, "References," should list the most recent versions of the documents. For example:

- 1) DOE 1995b, *Quality Assurance Requirements and Description for the Civilian Radioactive Waste Management Program (QARD)*, DOE/RW-0333P, Rev. 5, US Department of Energy, Washington, D.C should reference Revision 10 which was issued April 28, 2000.
- 2) DOE-RL 1999, *Review Guidance for the Construction Authorization Request (CAR)*, RL/REG-99-05, U.S. Department of Energy, Richland, Washington, should reference Revision 3 which was issued in July 2001.

Attachment 3 to the ABCN, "Regulatory Guide 3.52 vs Table of Contents Crosswalk," compares the section titles in Regulatory Guide 3.52 to the proposed location in the WTP SAR. The OSR has the following comments on Attachment 3:

- 1) In the column headings, column 3 is listed as "ISMP Addition or Subtraction." This should be just "Addition or Subtraction."
- 2) Several of the Section numbers under "RG 3.52 Chapter" show no corresponding Section number under "WTP New Location." This may be due to the fact that the Section in RG 3.52 was simply a title with no corresponding guidance (e.g., Section 1.0, "General Information"). BNI should review the entrees in the Table of Contents Crosswalk to ensure that where guidance is provided in RG 3.52, BNI has identified where this is covered in the WTP new location. For example, RG 3.52 Section 2.2 discusses Safety Committees. The location of the Safety Committees topic should be identified.
- 3) RG 3.52 Section 3.10 and 3.11 - These are listed twice in the BNI matrix, on page 2 of 15 and page 5 of 15.

- 4) RG 3.52 Section 3.4.3 through 3.4.8 - All of these subsections are related to training. However, BNI indicates that they will be covered in Section 12.3, Procedures Program. These should be covered under Section 12.4, Training.
- 5) RG 3.52 Section 3.8 through 3.8.4 - All of these sections deal with records management. BNI indicates that they will be discussed in Section 17.4.4 and in the QAM. All should be discussed in Section 17.4.4 of the PSAR.
- 6) RG 3.52 Section 4.4, Process Safety Information - BNI indicates that this information will be in two sections of the PSAR, Section 3.3.3.X, Hazard Evaluation, and Section 8.6.1, Hazardous Material Identification. BNI should consider putting the information in one section and cross-referencing it to the other section.
- 7) RG 3.52 Section 4.9, Administrative Control of the ISA - BNI indicates that this will be discussed in Section 3.3.3, Changes to the Authorization Basis, of the ISMP. This should also be discussed in the PSAR.
- 8) RG 3.52 Section 5.12, Instrumentation - BNI indicates that this will be discussed in Sections 7.5, Radiological Protection Program, and 7.8, Radiological Protection Record Keeping. This should be discussed in Section 7.7, Radiological Monitoring.
- 9) RG 3.52 Section 6.1.4, Validation and Use of Analytical Models – The term "CSER 4" in the WTP New Location Section should be explained.
- 10) RG 3.52 Section 7.4, "Hazardous Waste Management" and 7.4, "Consequence Estimates"- BNI has two different titles listed for Section 7.4.
- 11) RG 3.52 Section 8.1.3, Fire Prevention Program - BNI indicates that this will be discussed in PSAR Section 18.5, Combustible Loading Control. This should be discussed in Section 18.4, Fire Protection Program and Organization.
- 12) RG 3.52 Section 8.4, Fire Hazard Analysis - BNI indicates that this will be discussed in Section 18.8, Fire Hazard Analysis Summary of the PSAR. However, the outline for the PSAR submitted by BNI (Attachment 1 to the ABCN) did not show a Section 18.8. The contents of Section 18.8 should be clarified.
- 13) RG 3.52 Section 11.1, Conceptual Decommissioning Plan - BNI indicates that this will be discussed in Section 16.1, Introduction, of the PSAR. However, DOE/RL-96-0003, Section 4.3.2, Item 6 requires the Contractor to submit a draft deactivation plan with the Construction Authorization Request. Therefore, this should be a separate submittal, not an item covered in the Introduction Section.
- 14) A large number of the section titles provided by BNI for the "WTP New Location" are inconsistent with the PSAR outline provided in Attachment 1 to the ABCN. For example, see the following RG 3.52 numbered sections: 5.14, 6.1, 6.2, 6.2.1, 7.0, 7.1, 7.2, 7.3, 7.4, 8.1, 8.1.1, 8.1.2, 8.3, 9.0, 9.13, 9.16, 10.0, 10.1.6, 10.2.2, 11.1.1, and Appendix B. All such inconsistencies should be identified, corrected, and the Table resubmitted.

The recommendation statements for resolution of the issues above are an acceptable means of resolution. Alternative approaches may also be acceptable, if adequately justified.

Attachment 4 to the ABCN, "DOE/RL-96-0003 vs SAR Table of Contents Crosswalk," shows where the general requirements on Contractor Input to the Construction Authorization Request will be located in the SAR. Section 4.3.2 A (14) uses the term "safety-related" rather than the OSR term "important-to-safety." This is probably due to the comparison to Rev. 1 of DOE/RL-96-0003. The term "safety-related" was changed to "important-to-safety" in Rev. 2. Attachment 4 to the ABCN should be revised to use the defined term "important to safety."

Attachment 5 to the ABCN, "Identification of Implementing Standard for the RPP-WTP Safety Analysis Reports," is a summary report of the Integrated Safety Management (ISM) Team evaluation of standards for preparing SARs. The report recommends use of DOE-STD-3009-94 as described in the ad hoc implementing standard for "format and content" for SARs. This recommendation is different than the ABCN proposal to use DOE-STD-3009-94 for format and Regulatory Guide 3.52 for content (see Section K, "Justification of the proposed change" of the ABCN). Attachment 5 to the ABCN should be updated accordingly.

4.0 CONCLUSION

The proposed changes to the SRD were acceptable, with the exception of SRD-SC 9.1-7 which proposed to delete the requirement that the hazard analysis be submitted as part of the SAR, based on the considerations described above. This change was not acceptable since submittal of a revised hazard analysis with the Construction Authorization Request is a contract requirement. The OSR has concluded that there is reasonable assurance that the health and safety of the public and the workers will not be adversely affected by the proposed amendments to the SRD, and that they comply with applicable laws, regulations, and RPP-WTP contractual requirements. Accordingly, except for the proposed changes to the SRD-SC 9.1-7 involving deletion of the requirement to submit a hazard analysis, the OSR approves the amendments to the SRD as proposed by ABCN-224590-01-0006.

The proposed changes to the ISMP were acceptable, with the exception of a) replacing reference to Regulatory Guide 3.52 with reference to SRD Volume II, Section 9.1 for the format and content of the SAR (format only is acceptable), and b) deletion of Regulatory Guide 3.52 and NUREG-1520 from the reference list, based on the considerations described above. The OSR has concluded that there is reasonable assurance that the health and safety of the public and the workers will not be adversely affected by the proposed amendments to the ISMP, and that they comply with applicable laws, regulations, and RPP-WTP contractual requirements. Accordingly, the OSR approves the amendments to the ISMP, except for the exceptions noted above, as proposed by ABCN-224590-01-0006.

OSR comments on the other portions of the ABCN are offered for clarification and do not represent substantive changes to the ABCN. Recommended OSR changes provide an acceptable resolution to the comments, although alternative approaches may also be acceptable, if adequately justified.